
HUMAN HEALTH RISK ASSESSMENT
FOR THE
TRANSIT AMERICA INC. RED LION ROAD FACILITY

DOCUMENT 2
VOLUME 1

Submitted by: Transit America Inc.
One Red Lion Road
Philadelphia, PA 19115

Submitted to: Pennsylvania Department of Environmental Protection
Environmental Cleanup Program
Southeast Regional Office
Conshohocken, PA 19428

Pursuant to: Pennsylvania Land Recycling and Environmental
Remediation Standards Act (Act 2)

Prepared by: Environmental Standards, Inc.
1140 Valley Forge Road
P.O. Box 911
Valley Forge, PA 19482-0911

March 1998

MANKO
GOLD &
KATCHER

RECEIVED
DECEMBER 24 1997

December 23, 1997

500
CITY AVENUE
CYNWYD, PA 19004

660-5700
660-5711 FAX

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ETH J. WARREN
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HAN E. RINDE
F. GULLACE
J. CASSIDY
EINE H. COZINE
A. HUSTIS GOTANDA
HAN H. SPERGER
FINE G. MOONEY
A. FITZPATRICK

MITTED IN NJ

D. BORRELLI
TING ENGINEER

ERSEY OFFICE:
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17-1299
17-1296 FAX

Mr. Bruce Beitler
Environmental Cleanup Program Manager
Pennsylvania Department of
Environmental Protection
Southeast Regional Office
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

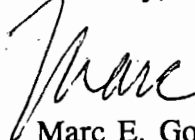
Re: Transit America Inc.
ID #PAD002277234
Philadelphia/Montgomery County

Dear Bruce:

In accordance with the Land Recycling and Environmental Remediation Standards Act ("Act 2"), enclosed is a copy of the notice letters to the City of Philadelphia and Township of Lower Moreland along with the certified mail receipts and a copy of the proof of publications from the local newspapers for the subject property. These documents relate to submission of the Notice of Intent to Remediate to DEP on December 1, 1997.

Please call me with any questions.

Sincerely,



Marc E. Gold
For MANKO, GOLD & KATCHER

MEG/nav/10554-001

Enclosure

cc: Jennifer Berke, Esquire (w/encl.)

ENVIRONMENTAL
PRACTICE

28746 12/23/97



No. _____ Term, 19 _____

Proof of Publication in The Philadelphia Daily News
Under Act No. 587, Approved May 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA { ss.:

Mary Sullivan

being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice or publication is attached hereto exactly as the same was printed or published in the regular editions and issues of the said newspaper on the following dates, viz.:

and the 4th day of December A.D. 1997

Affiant further deposes and says that he is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that he is not interested in the subject matter of the aforesaid notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

Mary Sullivan

Sworn to and subscribed before me this 4th day of

December 1997

Elaine Smith
Notary Public

Commission Expires:

NOTARIAL SEAL
ELAINE SMITH, Notary Public
City of Philadelphia, Pennsylvania
My Commission Expires: 06/30/98

Copy of notice or publication

NOTICE
Pursuant to the Land Recycling and Environmental Remediation Standards Act, 35 P.S. §§6026.101 et seq., notice is hereby given that Transil America Inc. ("Transil America") has submitted to the Pennsylvania Department of Environmental Protection ("DEP") a Notice of Intent to Remediate ("NIR") a site located at One Red Lion Road, Philadelphia, Pennsylvania (a portion of the site is also located in Lower Moreland Township, Montgomery County, Pennsylvania) (the "Site"). The Site was a former automotive parts and radiator manufacturer. The Site has been found to be contaminated with heavy metals, solvents, PAHs, petroleum hydrocarbons, PCBs and BTEX which has contaminated soil and/or groundwater on the Site. Transil America has indicated that the proposed remediation measures will include soil removal, groundwater extraction, and engineering and institutional controls. The proposed future use of the property will be as a public golf course with ancillary commercial activities. Transil America plans to use a combination of Act 2 standards including the site-specific standard at the Site. Act 2 provides for a 30-day public comment period for site-specific standard remediations. The 30-day comment period is initiated with the publication of this notice. Until January 3, 1998, the City of Philadelphia and Lower Moreland Township may submit a request to Transil America to be involved in the development of the remediation and reuse plans for the Site. The City of Philadelphia and Lower Moreland Township may also submit a request to Transil America during the 30-day comment period to develop and implement a public involvement plan. Copies of these requests and of any comments should be submitted to Bruce Beidler at the Southeast Regional Office of DEP.

Sarah



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
641 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

NOV 21 1997

Honorable Jon D. Fox
Member, House of Representatives
1000 Easton & Edge Roads
Abington, PA 19001

Dear Congressman Fox:

Thank you for your letter of October 2, 1997, regarding the Transit America property at Red Lion Road in Philadelphia, and possible contamination of well water in the Pine Road area of Huntingdon Valley. An Environmental Protection Agency representative, attorney Heather Gray Torres of this office, has spoken with Janice Harvey of your office, and has outlined EPA's involvement regarding this area.

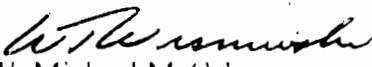

EPA is aware that Transit America is planning to build a golf course at this location, the former Budd facility. Transit America representatives met with EPA officials in April 1997, to outline these plans. This property, however, is not a Superfund site and is not one on which EPA is taking an active role. This is based on information currently known to EPA. The Pennsylvania Department of Environmental Protection (PADEP) has been actively overseeing this site for several years, and it is EPA's understanding that Transit America is submitting a clean up plan to PADEP under Pennsylvania's Act 2 program. We informed Ms. Harvey of the PADEP names and contact numbers for this property.

We are forwarding to you copies of some documents EPA does have concerning this location; specifically the overview report Transit America provided us in April. EPA does have other files that bear upon this site, but they do not appear to be directly related to the questions in your October 2 letter. EPA has files of a PCB enforcement action we took that was concluded by 1991, and we have files of an early 1980's soils investigation at an adjacent location designated Sandmeyer Lane. Among our other files are some copies of reports from PADEP. We would be happy to provide all these files, but we believe that the most up-to-date answer to your technical questions regarding groundwater would be reflected in PADEP's active file on this.

You have also asked whether the residents would be eligible for compensation from Transit America. It is possible that residents could be eligible for some type of compensation from a source of contamination, but this would be a matter set forth in state law, and interpreted by Pennsylvania state courts. We advised Ms. Harvey that your office could contact Attorney Jennifer Berke of Transit America to discuss this question.

Thank you again for your inquiry. If you have any questions, please feel free to contact me or have your staff contact Mr. Richard Van Holt, Freedom of Information Act Officer, at 215-566-5553.

Sincerely,


W. Michael McCabe
 Regional Administrator

Enclosures

cc: Bruce Beitler, PADEP

**TRANSIT AMERICA MEETING WITH
ENVIRONMENTAL PROTECTION AGENCY
THURSDAY, APRIL 24, 1997**

AGENDA

1. Introduction - Transit America Team
2. Site Reuse Plan
3. Community Outreach Program
4. Description of Ongoing Site Investigation
and Remediation Activities
5. Planned Future Actions
6. Future Communications
7. Summary and Conclusion



TransitAmerica Inc.

One Red Lion Road, Philadelphia, PA. 19115 (215) 934-3400
• FAX (215) 871-0227

REPLY TO: Jennifer Berke, Esquire
2450 Hunting Park Avenue
Building 4K
Philadelphia, PA 19129-1397

DIRECT DIAL: (215) 221-6890
(215) 221-7444 (FAX)

April 29, 1997

Stanley Laskowski,
Deputy Regional Administrator
U.S. Environmental Protection Agency
Region III
841 Chestnut Street (3DA00)
Philadelphia, PA 19107

RE: Transit America Redevelopment Plan

Dear Stan:

Transit America greatly appreciated the opportunity to meet with you, Abe Ferdas and Heather Gray Torres on April 25 to discuss redevelopment of our brownfields site. As we discussed, Ray Germann of ERM's Public Relations and Community Affairs Group, will contact Pat Boyle concerning the public/community affairs aspects of this project.

As promised, I am enclosing some articles from Transit America's growing collection of golf course literature addressing how golf course developments can become environmental assets in addition to the more obvious benefits of turning a brownfields site into green, open space. In addition, I thought you would be interested in the publication entitled "An Environmental Approach to Golf Course Development", published by the American Society of Golf Course Architects.

Again, thank you for meeting with us. We would be pleased to answer any additional questions you may have with respect to our project.

Very truly yours,

TRANSIT AMERICA INC.

Jennifer Berke
Counsel

Enclosures

cc: B. Cushing (AEM) (w/o enclosures)
R. Germann (" ")
M. Gold (MG&K) (" ")
C. Payne (" ")
A. Ferdas (EPA) (" ")
H. Torres (EPA) (" ")

JB/jt

TRANSIT AMERICA
RED LION ROAD FACILITY
MONTGOMERY AND PHILADELPHIA COUNTIES, PA

ENVIRONMENTAL STATUS

APRIL 1997

TRANSIT AMERICA RED LION ROAD FACILITY

ENVIRONMENTAL MEASURES: BUILDINGS / STRUCTURES

Primary Buildings:	Main Assembly Building	1.15 million sq. ft. (26.5 acres)
	and Rainbow Room	
	Chevrolet Building	225,000 sq. ft. (5 acres)

1987 - 1991	Sampling programs inside buildings identified elevated levels of PCBs in and on concrete surfaces, based on wipe samples, samples of surface deposits, and destructive samples.
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1990 - 1991 Open press pits and conveyor tunnels in the MAB were decontaminated, which included removal and disposal of equipment, scrap, grime, oil, and water, followed by high pressure washing of surfaces.

1993 The two million gallon capacity Concrete Basin was remediated. One million gallons of water were treated and discharged to the POTW. Sediment was removed from the basin, dewatered, and all 176 tons were incinerated offsite

1994 Asbestos abatement was accomplished in the MAB. Asbestos abatement has also been accomplished during maintenance activities on boilers, piping, and tanks.

1996 Decontamination of interior surfaces (3.5 million square feet) was accomplished in the MAB and Rainbow Room, by removal and offsite disposal of non-concrete materials and by high-pressure spray-washing of concrete surfaces.

1997 Additional open conveyor tunnels in the MAB were dewatered and decontaminated.

TOTAL COSTS INCURRED: \$3.5 million

TRANSIT AMERICA RED LION ROAD FACILITY

ENVIRONMENTAL MEASURES: SITE SOILS / GROUNDWATER

- 1987 O'Brien & Gere (OBG), an environmental consulting firm, was retained by Transit America to perform an environmental assessment in anticipation of the sale of the property.
- 1989 A site evaluation report, prepared by OBG, was submitted to the PA DER culminating the two year, phased environmental investigation, a \$3.5 million effort. Three parts: Site Characterization, Risk Assessment, and Remedial Action Programs.
- The site characterization identified 26 PCB-contaminated soil areas of concern, including eight former disposal pits and 18 surface soil areas. Also, VOCs in disposal pits and in groundwater were identified.
 - The risk assessment evaluated risks posed by three possible exposure pathways and determined that individual and cumulative health risks were within an acceptable range.
 - Remedial action programs were proposed with specific objectives for control of stormwater runoff, groundwater, and contaminated surface and subsurface soils.

(cont'd)

TRANSIT AMERICA RED LION ROAD FACILITY

ENVIRONMENTAL MEASURES:

SITE SOILS / GROUNDWATER (cont'd)

STORMWATER

- 1990 - 1994 Stormwater controls were installed at the Stormwater Retention Basin and Site B. These included: silt fences, rock barriers, inlet sediment traps, straw bale dikes, a riser pipe control structure, and a geotextile erosion control mat.
- 1989 - 1996 Five stormwater sampling events were performed.
- 1996 NPDES Stormwater Discharge Permit PA 0056502 was issued for the site in Feb 1996.

VOCs IN GROUNDWATER

- 1990 - 1993 80 monitoring wells were installed into either the overburden or the bedrock aquifer, and 14 extraction wells were installed, in stages. Five discrete plumes with VOCs were identified. No PCBs in groundwater were identified.
- 1990 - 1994 Five years of quarterly groundwater monitoring was performed with the approval of the PA DEP, and with annual reports submitted to the PA DEP.
- 1995 - 1996 A groundwater extraction program, approved by the PA DEP, was initiated, and established hydraulic control of the five plumes. The program is continuing.

(cont'd)

TRANSIT AMERICA RED LION ROAD FACILITY

ENVIRONMENTAL MEASURES:

SITE SOILS / GROUNDWATER (cont'd)

VOCs IN SOILS

- 1987 - 1994 Twelve underground storage tanks (USTs) were closed in place or removed and disposed. Included were two fuel oil storage tanks and ten paint product / solvent tanks.
- 1994 - present Soil vapor extraction was implemented. The eight areas targeted were areas with VOC contamination at depth that could contribute to groundwater contamination. Phase I, for four of the areas, has been completed, reported, and approved by the PA DEP. Phase II, for the other four areas, was completed in April 1997.
- 1996 Two active fuel storage USTs were decommissioned, removed, and disposed offsite.

PCB-CONTAMINATED SURFACE SOILS

- 1995 - present Several programs of surface soil and debris sampling and analysis for PCBs were performed, to fill data gaps at selected locations.
- 1996 1600 cubic yards of hot spot surface soils were selectively removed and disposed at an offsite TSCA landfill.

TOTAL COSTS INCURRED: \$9.7 million